

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

BRIAN KEKICH,

Fed. Case No. _____

Plaintiff,

Minn. Case No. (unknown, unfiled)

v.

POPULUS GROUP, LLC,

Defendant.

DEFENDANT'S NOTICE OF REMOVAL

Plaintiff brian kekich and his attorneys Blaine L.M. Barlow, Halunen Law, 1650 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402.

Defendant Populus Group, LLC, hereby gives notice of its removal of this action on the following grounds:

1. Plaintiff brian kekich commenced this civil action in the Hennepin County District Court, Fourth Judicial District, State of Minnesota. A copy of the Summons (June 21, 2021) and the Complaint (June 21, 2021), being all the process, pleadings, and orders served in the state-court action, accompanies this notice as Exhibits A and B. (As far as Defendant Populus Group, LLC., knows, neither these papers nor any others have been filed with the state court in the state-court action.)

2. The Complaint was the initial pleading setting forth the purported claims for relief upon which the state-court action is based.

3. The case that the Complaint purportedly stated was and is removable.

4. Defendant Populus Group, LLC, received the Summons and the Complaint by service on June 23, 2021. It had not received the Summons or the Complaint in any other manner before June 23, 2021.

5. Defendant Populus Group, LLC, is filing this notice within 30 days after receiving the Summons and the Complaint.

6. Neither Defendant Populus Group, LLC nor its members are citizens of the State of Minnesota, as set forth in the Declaration James L. Mann, attached hereto as Exhibit C.

7. This Court has original jurisdiction over the state-court action under 28 U.S.C. §§ 1332(a).

8. The state-court action is removable under 28 U.S.C. § 1441(a) & § 1446.

9. The state-court action is not a nonremovable action under 28 U.S.C. § 1445.

10. Promptly after filing this notice, Defendant Populus Group, LLC, will give written notice to the adverse Party, and will file a copy with the Clerk of the state court.

Wherefore Defendant Populus Group, LLC, respectfully prays that the state court proceed no further, and that any further proceedings in this action occur in the United States District Court for the District of Minnesota.

July 14, 2021.

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